



**Air Quality
TIER II OPERATING PERMIT
and
PERMIT TO CONSTRUCT**

**State of Idaho
Department of Environmental Quality**

PERMIT No.: T2-050114

FACILITY ID No.: 055-00038

AQCR: 62

CLASS: B

SIC: 2520

ZONE: 11

UTM COORDINATE (km): 502.3, 5284.7

1. PERMITTEE

flexcel – Post Falls

2. PROJECT

Synthetic Minor Operating Permit and Permit to Construct

3. MAILING ADDRESS

1881 W. Seltice Way

CITY

Post Falls

STATE

ID

ZIP

83854

4. FACILITY CONTACT

Terry Hentges

TITLE

Safety & Environmental Manager

TELEPHONE

(208) 777-6686

5. RESPONSIBLE OFFICIAL

Donald Myers

TITLE

Director of Metal Furniture Operations

TELEPHONE

(208) 777-6600

6. EXACT PLANT LOCATION

1881 W. Seltice Way, Post Falls, Idaho

COUNTY

Kootenai

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Manufacture of metal office furniture

8. PERMIT AUTHORITY

This permit to construct and Tier II operating permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200-228 and IDAPA 58.01.01.400-470, respectively. This permit pertains only to emissions of air contaminants, which are regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

Only the terms and conditions pertaining to Tier II operating permit requirements are subject to the expiration date of this permit.

The permit to construct conditions in this permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's (DEQ) technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200 of the Rules for the Control of Air Pollution in Idaho.

TONI HARDESTY, DIRECTOR
DEPARTMENT OF ENVIRONMENTAL QUALITY

Date Issued:

Public Comment

Date Modified/Revised:

Date Expires:

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Acronyms, Units, and Chemical Nomenclatures

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
ASTM	American Society for Testing and Materials
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
gr	grain (1 lb = 7,000 grains)
HAPs	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
lb/hr	pound per hour
MMBtu	million British thermal units
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO ₂	sulfur dioxide
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No.: T2-050114**Permittee:** flexcel – Post Falls**Location:** Post Falls**Facility ID No.** 055-00038**1. PERMIT SCOPE*****Purpose***

1.1 The purpose for this permit is the following:

- To establish the facility as a synthetic minor source, no longer subject to Tier I operating permit requirements in accordance with IDAPA 58.01.01.300-386;
- To incorporate the terms and conditions of PTC No. P-020123, issued January 27, 2003; and
- To allow for the installation of a powder coating process line.

1.2 This Tier II operating permit and permit to construct replaces the following permits, the terms and conditions of which shall no longer apply:

- PTC No. P-020123, issued January 27, 2003
- Tier I Operating Permit No. T1-030102, issued April 1, 2003

Regulated Sources

1.3 Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
3	Dry-Off Oven	None
4	Curing Oven	None
5	Burn-Off Oven	None
6	Work Surfaces Contact Adhesive Booth	Filter System
6	4 Powder Coating Booths	Filter System

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2. FACILITY-WIDE CONDITIONS

Fugitive Emissions

- 2.1 All reasonable precautions shall be taken to prevent PM from becoming airborne in accordance with IDAPA 58.01.01.650-651. In determining what is reasonable, considerations will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of particulate matter. Some of the reasonable precautions include, but are not limited to, the following:
- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
 - Application, where practical, of asphalt, water, or suitable chemicals to, or covering of, dirt roads, material stockpiles, and other surfaces which can create dust.
 - Installation and use, where practical, of hoods, fans, and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations.
 - Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts.
 - Paving of roadways and their maintenance in a clean condition, where practical.
 - Prompt removal of earth or other stored material from streets, where practical.
- 2.2 The permittee shall monitor and maintain records of the frequency and the method(s) used (i.e., water, chemical dust suppressants, etc.) to reasonably control fugitive emissions.
- 2.3 The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.
- 2.4 The permittee shall conduct a quarterly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (If observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

Odors

- 2.5 The permittee shall not allow, suffer, cause, or permit the emission of odorous gases, liquids, or solids to the atmosphere in such quantities as to cause air pollution.

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- 2.6 The permittee shall maintain records of all odor complaints received. If the complaint has merit, the permittee shall take appropriate corrective action as expeditiously as practicable. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

Visible Emissions

- 2.7 The permittee shall not discharge any air pollutant to the atmosphere from any point of emission for a period or periods aggregating more than three minutes in any 60-minute period which is greater than 20% opacity as determined by procedures contained in IDAPA 58.01.01.625. These provisions shall not apply when the presence of uncombined water, NO_x, and/or chlorine gas is the only reason for the failure of the emission to comply with the requirements of this section.
- 2.8 The permittee shall conduct a quarterly facility-wide inspection of potential sources of visible emissions, during daylight hours and under normal operating conditions. The visible emissions inspection shall consist of a see/no see evaluation for each potential source. If any visible emissions are present from any point of emission, the permittee shall either take appropriate corrective action as expeditiously as practicable, or perform a Method 9 opacity test in accordance with the procedures outlined in IDAPA 58.01.01.625. A minimum of 30 observations shall be recorded when conducting the opacity test. If opacity is greater than 20% for a period or periods aggregating more than three minutes in any 60-minute period, the permittee shall take all necessary corrective action and report the exceedance in accordance with IDAPA 58.01.01.130-136. The permittee shall maintain records of the results of each visible emissions inspection and each opacity test when conducted. The records shall include, at a minimum, the date and results of each inspection and test and a description of the following: the permittee's assessment of the conditions existing at the time visible emissions are present (if observed), any corrective action taken in response to the visible emissions, and the date corrective action was taken.

Excess Emissions

- 2.9 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

Open Burning

- 2.10 The permittee shall comply with the requirements of the Rules for Control of Open Burning, IDAPA 58.01.01.600-616.

Reports and Certifications

- 2.11 Any reporting required by this permit, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, notifications of intent to test, testing reports, or compliance certifications, shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete. Any reporting required by this permit, **with the**

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exception of a **Portable Equipment Registration and Relocation form**, shall be submitted to the following address:

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Air Quality Permit Compliance
Department of Environmental Quality
Coeur d'Alene Regional Office
2110 Ironwood Parkway
Coeur d'Alene, ID 83814
Phone: (208) 769-1422
Fax: (208) 769-1404

Fuel-burning Equipment

- 2.12 The permittee shall not discharge to the atmosphere from any fuel-burning equipment PM in excess of 0.015 gr/dscf of effluent gas corrected to 3% oxygen by volume for gas.

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3. DRY-OFF OVEN

3.1 Process Description

Steel furniture parts go through a washing operation. When the parts exit the last stage of the washer, they are carried by the overhead conveyor through the dry-off oven. This oven is heated with a natural gas burner with a heat-input capacity of 3.5 MMBtu/hr. The burner has one stack: stack 24.

3.2 Emission Control Description

Emissions from the dry-off oven are uncontrolled.

Emissions Limits

3.3 Dry-off Oven Burner Stacks 24

- Nitrogen oxides emissions from the dry-off oven burner stack 24 shall not exceed 0.49 lb/hr.
- Nitrogen oxides emissions from the dry-off oven burner stack 24 shall not exceed 2.15 tons per any consecutive 12-month period.

[PTC Condition]

Operating Requirements

- 3.4 The dry-off oven burners shall be fueled with natural gas exclusively.

[PTC Condition]

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No.: T2-050114**Permittee:** flexcel – Post Falls**Location:** Post Falls**Facility ID No.** 055-00038**4. CURING OVEN****4.1 Process Description**

After the dry-off oven, the steel furniture parts are powder coated and conveyed to a two-stage curing oven. Curing oven stage 1 and stage 2 each use a 6.0 MMBtu/hr natural gas-fired burner to supply heat to dry the powder coating. A third, 6.0 MMBtu/hr natural gas-fired burner is used as a space heater that provides heat for the curing oven room during the winter months. Curing oven stages 1 and 2 exhaust emissions through stacks 29 and 30, respectively. The curing oven space heater vents emissions through stack 26.

4.2 Emission Control Description

Emissions from the curing oven are uncontrolled

Emissions Limits**4.3 Curing Oven Stacks 26, 29, and 30**

- Nitrogen oxides emissions from the curing oven stack 26 shall not exceed 0.74 lb/hr.
- Nitrogen oxides emissions from the curing oven stack 26 shall not exceed 3.26 tons per any consecutive 12-month period.
- Nitrogen oxides emissions from the curing oven stack 29 shall not exceed 0.75 lb/hr.
- Nitrogen oxides emissions from the curing oven stack 29 shall not exceed 3.27 tons per any consecutive 12-month period.
- Nitrogen oxides emissions from the curing oven stack 30 shall not exceed 0.75 lb/hr.
- Nitrogen oxides emissions from the curing oven stack 30 shall not exceed 3.27 tons per any consecutive 12-month period.

[PTC Condition]***Operating Requirements***

- 4.4 The curing oven burners and the curing oven room space heater burner shall be fueled exclusively with natural gas.

[PTC Condition].

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No.: T2-050114**Permittee:** flexcel – Post Falls**Location:** Post Falls**Facility ID No.** 055-00038**5. BURN-OFF OVEN****5.1 Process Description**

After the parts have been processed through the curing oven, the burn-off oven is used to remove cured powder coating from conveyor part hangers and other powder coating-encrusted steel parts. The oven has a 2.0 MMBtu/hr natural gas-fired burner.

5.2 Emission Control Description

Emissions from the burn-off oven are uncontrolled.

Emissions Limits**5.3 Burn-off Oven**

- Nitrogen oxides emissions from the burn-off oven stack shall not exceed 0.67 lb/hr.
- Nitrogen oxides emissions from the burn-off oven stack shall not exceed 2.94 tons per any consecutive 12-month period.

[PTC Condition]***Operating Requirements***

- 5.4 The burn-off oven burner shall be fueled exclusively with natural gas.

[PTC Condition]

- 5.5 The gas-fired burn-off oven shall not be operated at temperatures above 1,400 degrees Fahrenheit.

[PTC Condition]

- 5.6 The burn-off oven shall be restricted to 6,000 hooks and powder coating-encrusted parts, combined, processed in a day.

[PTC Condition]

- 5.7 The burn-off oven shall be used to thermally clean powder coating, adhesives, and other coatings from powder coating hooks and powder coating-encrusted parts.

[PTC Condition]***Monitoring & Recordkeeping Requirements***

- 5.8 The permittee shall install, calibrate, maintain, and operate a monitoring device for the continuous measurement and recording of the burn-off oven chamber temperature. These records shall be kept onsite for a minimum of two years and shall be made available to DEQ representatives upon request.

- 5.8.1 The temperature shall be recorded daily while the burn-off oven is operating at normal capacity.

- 5.8.2 The monitoring device must be certified by the manufacturer to be accurate within 1% of the measured value and must be calibrated on an annual basis in accordance with manufacturer instructions.

AIR QUALITY TIER II OPERATING PERMIT AND PERMIT TO CONSTRUCT No.: T2-050114**Permittee:** flexcel – Post Falls**Location:** Post Falls**Facility ID No.** 055-00038**[PTC Condition]****6. FACILITY-WIDE SOLVENT, ADHESIVE, AND OTHER CHEMICAL USE****6.1 Process Description**

Various solvents, adhesives and other chemicals are used in the manufacture of work surfaces from particleboard, the application of solvent-based contact adhesive to attach melamine banding material to wood, and the application of veneer to work surfaces.

After metal furniture parts are made and cleaned, they are powder coated. There are four powder coating booths. The parts are then dried in a two-stage curing oven.

Work surfaces are manufactured from particleboard. Thin sheets of laminate are glued to the fiberboard with a roll coat application process and water-base glue. Work surfaces are cut to shape on either a panel saw or router. Sawdust is collected in one of two baghouses that return filtered air into the room. Solvent-based contact adhesive is used to glue melamine banding material to the wood, using a spray booth during the glue application. At the Reasons spray booth, spray adhesive is also applied to metal frames, onto which metal sheets or insulation are attached.

6.2 Emission Control Description

Table 6.1 describes the control devices used in controlling emissions from the sources regulated in this permit.

Table 6.1 DRY OFF OVEN DESCRIPTION

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
Work Surfaces Contact Adhesive Booth	Filter System	Stack
Reasons spray booth	Filter System	Stack

Emissions Limits**6.3 Particulate Matter**

- Emissions of PM₁₀ generated from the use of all adhesives, and other chemicals from the facility shall not exceed 1.4 lb/hr.
- Emissions of PM₁₀ generated from the use of all adhesives, and other chemicals from the facility shall not exceed 6.13 tons per any consecutive 12-month period.

[PTC Condition]***Operating Requirements***

- 6.4 The permittee shall install and maintain filter systems to control particulate generated at the work surfaces contact adhesive application process and Reasons spray booth. The filter systems shall have a minimum control efficiency of 96%.

[PTC Condition]

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- 6.5 The filters shall be replaced every 80 hours of operation, or at any other time that a filter becomes damaged or is otherwise unable to meet the minimum control efficiency of 96%.

[PTC Condition]

Monitoring and Recordkeeping Requirements

- 6.6 The permittee shall monitor and record the days of operation of the work surfaces contact adhesive booth and Reasons spray booth. The permittee shall also record the date and time that each filter is changed to demonstrate compliance with Permit Condition 6.5. The reason for the filter change shall also be noted (i.e., routine maintenance or damaged filter). The records shall be maintained onsite for a minimum of five years and shall be made available to DEQ representatives upon request.

[PTC Condition]

- 6.7 The permittee shall maintain monthly records which shall contain, but not be limited to, adhesives or other chemical compounds used at the facility. These records shall be kept onsite for a minimum of five years and shall be made available to DEQ representatives upon request.

[PTC Condition]

- 6.8 The permittee shall monitor and record the daily and monthly hours of operation. The monthly hours of operation shall be determined by summing each daily hours of operation for the previous month period. Records of this information shall be kept onsite for the most recent five year period and shall be made available to DEQ representatives upon request

[PTC Condition]

- 6.9 The permittee shall calculate the monthly weighted average solids percent by weight of all adhesives, and other chemicals used at the facility to determine compliance with Permit Conditions 6.3. The permittee shall also calculate the total monthly emissions of PM₁₀ from adhesives, solvents, and other chemicals used at the facility for the month. The monthly emissions of PM₁₀ shall be converted to a pounds-per-hour (lb/hr) value by dividing the monthly emission rate by the hours of operation to determine compliance with the emission limits listed for this permit.

All data and calculations used to determine PM₁₀ emissions from the facility shall be maintained onsite for the most recent five-year period, and shall be made available to DEQ representatives upon request.

[PTC Condition]

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7. GENERAL PROVISIONS

General Compliance

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.

[Idaho Code §39-101, et seq.]

2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

[IDAPA 58.01.01.405, 5/1/94]

3. Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules and regulations.

[IDAPA 58.01.01.406, 5/1/94]

Inspection and Entry

4. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
 - a. Enter upon the permittee's premises where an emissions source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108]

Performance Testing

5. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as

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approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00]

Monitoring and Recordkeeping

6. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.405, 5/1/94]

Excess Emissions

7. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

[IDAPA 58.01.01.130-136, 4/5/00]

Certification

8. All documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

[IDAPA 58.01.01.123, 5/1/94]

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False Statements

9. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.
[IDAPA 58.01.01.125, 3/23/98]

Tampering

10. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.
[IDAPA 58.01.01.126, 3/23/98]

Expiration and Renewal

11. This permit shall be renewable on the expiration date, provided the permittee submits an application for renewal to DEQ and continues to meet all terms and conditions contained in the permit. The expiration of this permit will not affect the operation of the stationary source or facility during the administrative procedure period associated with the permit renewal process.
[IDAPA 58.01.01.209.04, 7/1/02]

Transferability

12. This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.404.05.
[IDAPA 58.01.01.404.05, 4/11/06]

Severability

13. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.